

Robert N. Meltzer

Attorney At Law

September 15, 2021

Acton-Boxborough Regional School District  
15 Charter Road  
Acton, MA 01720  
Attn: Peter Light-Superintendent

Re: Michael Bush

Dear Superintendent Light:

Michael Bush has provided to me the short and dismissive letter you sent to him on August 31, 2021 in response to the thoughtful and carefully crafted letter he sent you on August 27, 2021.

While I may not necessarily agree that a demand under G.L. 93A applies to this situation, his letter reflects the legal positions effectively employed by this office during the past 18 months of litigation experience in terms of ADA requirements, HIPPA, religious exemptions and public accommodation with regard to the alleged pandemic.

What you are doing by refusing Mr. Bush's reasonable demands is setting up your district for prolonged and very expensive litigation, as the burden of proving any basis for the policy you state will be your burden, met by the team of medical and disabilities specialists that my office has assembled over the past 18 months. I am prepared to prove to a fact finder during a prolonged trial that while the policies you mention may have made sense 14 months ago (I do not stipulate to that), the "emergency" which ostensibly existed then does not exist now.

You are now attempting to enforce a political objective which violates federal and constitutional law. You are making yourself a test case for the absurdity of the current mask and vaccine policies, and we are ready to take you on.

I reached out this morning to Geoffrey Bok, who I know used to be counsel for the District. I understand he has retired. I have also reached out to your office to determine who your current counsel is, as it is my experience that the Justice Department and any judge expects the lawyers to at least discuss these kinds of cases prior to the filing of legal action. I am therefore requesting that you provide the contact information to me immediately. I am out of the office from 2 pm this afternoon through Friday morning, so it is imperative that a meet and confer with counsel transpire on Friday.

Thank you.

Very truly yours,



Robert N. Meltzer